

RECORD OF COMMUNICATION		<input type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE	
		<input type="checkbox"/> OTHER (SPECIFY) _____ (Record of item checked above)	
TO: South Cavalcade Files		FROM: Jim Pendergast 6H-EE	
		DATE: 7/6/88-7/21/88 TIME:	
SUBJECT: Discussions leading up to major revisions in the FS report			
SUMMARY OF COMMUNICATION			
<p>7/6: Shannon Craig promises to send bullet items on risk and treatment from first draft FS report.</p> <p>7/8: EPA receives bullet items via FAX. RPM begins review and notices difference between max PAH used in risk and the max PAH in the RI report. RPM calls Shannon Craig to notify her and ask WHY. This was done by ERT, contractor to the PRP. Shannon Craig (Keystone) states that if soils are added to the FS report, then the report will be late. RPM also notes that metals will need to be addressed in the FS report, and the 500 foot well as well.</p> <p>7/14: RPM discusses initial review again with Shannon Craig. 1. Soils need to be addressed. 2. If PRP cannot show no migration to lower aquifers, then PRP will need to completely remediate upper aquifers. 3. If PRP cannot show no migration though old 500 foot well, then PRP will need to monitor the lower aquifer. 4. Metals are needed; the upper aquifer is 10x the MCLs. Shannon says I need to discuss this with Jim Campbell of Keystone.</p> <p>7/18: Shannon called to say that the call to Campbell is set for 7/19. Also, she mailed sections 1, 2, 3, and 4 to me. Last, she said that ERT is using a geometric mean to calculate the risk. I told her that a mean of 2 data points is wrong, and EPA would not accept this.</p> <p>7/19: Phone call with Jim Campbell, Shannon Craig, and Paul Anderson (ERT). 1. Soils: Campbell asked a) why calculate risk if EPA will not use it (ref. is to Texarkana letter stating that EPA will also use other info), b) cap seems to solve problem, c) soil treatment is inconsistent with leaving dirty soil under the existing concrete. Response: a) EPA uses <u>all</u> info and is not limited to the risk assessment, b) SARA says treatment to MEP and a cap does not address this, c) implementability issues differentiate soils under concrete from other</p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
<p>soils. We also discussed other issues. Anderson will calculate soil cleanup level at 10^{-5} risk level; he believes this is 300 ppm carc. PAHs. Keystone will look at full soil alternatives from Texarkana.</p> <p>7/21: PRP meeting, see notes in file. Summary: Shannon Craig agreed to 1) soil cleanup, 2) aquifer cleanup to MCLs, 3) deep well if cannot show no migration. I will travel to Keystone with CDM next week to help quicken the review and provide direction. See trip notes</p>			
INFORMATION COPIES			
TO:			

006358